

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)
	)
	) No. 08 CR 437
v.	)
	) Magistrate Judge Arlander Keys
	)
MAURICE BELL	)
	)

**EMERGENCY AGREED MOTION TO MODIFY  
CONDITIONS OF PRETRIAL RELEASE**

Maurice Bell, defendant herein, by and through his attorney, Gary Ravitz, respectfully moves to modify the conditions of pretrial release, and in support states the following:

1. This Court recently placed Mr. Bell is on pretrial release with conditions, including a travelrestriction limiting his movements to the Northern District of Illinois and District of Arizona.

2. However, following the entry of the pretrial release order, Mr. Bell was ordered to appear in the Circuit Court of Sangamon County, at a hearing scheduled on June 30, 2008. Because Sangamon County is located within the Central District of Illinois, Mr. Bell requests a modification of the travel restrictions of the pretrial release order that will allow him to travel to and from that District.

3. The undersigned counsel has communicated with the government, which, in turn, informed him that it agrees to this proposed modification.

4. Given the fact that the scheduled appearance on June 30th will not give Mr. Bell sufficient time to give the usual three business days notice, he moves for relief as requested herein on an emergency basis.

5. Indeed, insofar as this motion is an agreed motion, he respectfully suggests that a minute order could be entered, granting the requested modification, without requiring any hearing or party appearance.

WHEREFORE, Maurice Bell respectfully moves for entry of an order modifying the pretrial release order as requested in this motion.

Respectfully submitted,

s/ Gary Ravitz

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Gary Ravitz, attorney for  
Maurice Bell

Ravitz & Palles, P.C.  
203 N. La Salle, Ste.2100  
Chicago, Illinois 60601  
(312) 558-1689